

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

FAIR ISAAC CORPORATION,

Court File No. 16-cv-1054 (WMW/DTS)

Plaintiff,

v.

FEDERAL INSURANCE COMPANY,
an Indiana corporation, and ACE
AMERICAN INSURANCE COMPANY,
a Pennsylvania corporation,

**DECLARATION OF
ZORICA TODOROVIC IN SUPPORT
OF DEFENDANTS' OPPOSITION
TO PLAINTIFF'S MOTION FOR
PARTIAL SUMMARY JUDGMENT**

Defendants.

I, Zorica Todorovic, declare as follows:

1. I was a Senior Vice President, Operations and IT, and Chief Information Officer for Chubb Insurance Company of Canada ("Chubb Canada"). In this role, I was familiar with the work of a third-party technology consultant, AppCentrica, from which Chubb Canada obtained additional personnel to assist it with the development of software applications.

2. The Chubb Group of Insurance Companies previously had multiple data centers supporting its operations around the world. Since the merger with ACE in 2016, the combined group of companies has been working to reduce the number of data centers they use. This reduction in data centers has been made possible by advancements in network capabilities. It is my understanding that in 2006 network capabilities were less

advanced. Due to these network limitations it would have been impractical to install software like FICO's Blaze Advisor ("Blaze") in one central server location and use it all over the world and anyone familiar with the software in 2006 would have understood this to be the case.

3. During my time at Chubb Canada the employees who made use of Blaze did so by accessing it through a virtual desktop environment. The versions of Blaze these users accessed were installed on remote servers located in Raleigh, North Carolina. To the best of my knowledge, Chubb Canada did not install Blaze on servers in Canada.

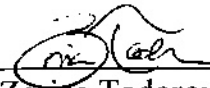
4. When AppCentrica personnel worked on IT projects in Chubb Canada's offices they used the same virtual desktop environment that accessed the servers at the data center in Raleigh, North Carolina. One AppCentrica consultant who was working in this virtual desktop environment used Blaze as a component when programming rules into another component of an application called Evolution. The Work Manager component was the only component of Evolution that used Blaze.

5. In 2015, Chubb Canada's virtual desktop environment was used to demonstrate how Blaze Advisor worked from a technical aspect to representatives from DWS Group and Chubb Insurance Company of Australia Ltd. ("Chubb Australia"). The goal was to create an Evolution system that could be used by Chubb Australia.

6. Ultimately, Chubb Australia did not use the Blaze portion of the Evolution component called Work Manager. Instead, Blaze was replaced with IBM Operational Decision Management.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: August 20, 2019



Zorica Todorovic